

EXHIBIT E

GIBSON DUNN

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October 9, 2012

VIA ELECTRONIC MAIL

Ethan A. Balogh, Esq.
Coleman & Balogh LLP
774 Montgomery Street, Fifth Floor
San Francisco, CA 94111
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Re: Subpoena to Google in *Chevron Corp. v. Donziger*, No. 11 civ. 0691 (S.D.N.Y.)

Dear Ethan:

As we discussed on the telephone, Chevron's subpoena seeks information about the briansethparker@gmail.com email account as it was (or is) related to the activities and events at issue in *Chevron Corp. v. Donziger*, No. 11 civ. 0691 (S.D.N.Y.). Accordingly, we are willing to withdraw category (A) of Chevron's document requests if Mr. Parker confirms in writing that he created this account and maintained exclusive control over the account in question from the time that it was created to the present (*i.e.*, that he did not provide the account credentials to anyone else for their use).

Further, as we discussed, the scope of category (B) can be limited to the dates relevant to Mr. Parker's communications with the defendants and non-party co-conspirators named in the *Chevron Corp. v. Donziger* case. Our understanding of Mr. Parker's prior testimony is that he worked with the defendants and non-party co-conspirators from February 1, 2009, through November 30, 2010. If Mr. Parker is able to confirm in writing that he is not currently working with the defendants or non-party co-conspirators, and that February 1, 2009, through November 30, 2010, is the only range of dates in which he used briansethparker@gmail.com to communicate with the defendants and non-party co-conspirators, then we are willing to limit the scope of the subpoena to those dates. If Mr. Parker cannot make such a representation, then we will be happy to discuss what additional date ranges should be included in the subpoena, or whether there are other adjustments to the scope of the subpoena that are appropriate.

Once we reach an understanding regarding scope, we will notify Google and Mr. Parker will need to indicate his agreement to the modified terms of the subpoena by completing Google's consent procedure through his account.

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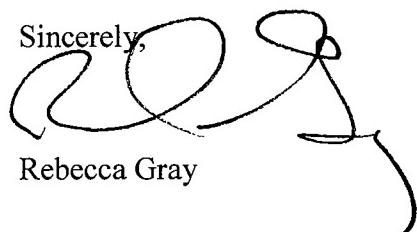
Ethan A. Balogh, Esq.

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We appreciate your willingness to meet and confer about this subpoena. Please feel free to call if you would like to discuss further.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Gray". The signature is fluid and cursive, with a large, stylized "R" at the beginning.

Rebecca Gray

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